

<p>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address</p> <p>Peter J. Mastan, Trustee peter.mastan@dinsmore.com 550 S. Hope St., Suite 2800 Los Angeles, CA 90071 Telephone: 213-335-7739</p> <p>Chapter 7 Trustee of the Bankruptcy Estate of Jessica Jocelyn Mendoza and Christian Michael Alaniz</p> <p><input checked="" type="checkbox"/> <i>Movant(s) appearing without an attorney</i> <input type="checkbox"/> <i>Attorney for Movant(s)</i></p>	<p>FOR COURT USE ONLY</p>
<p style="text-align: center;">UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</p>	
<p>In re:</p> <p>JESSICA JOCELYN MENDOZA CHRISTIAN MICHAEL ALANIZ</p> <p style="text-align: right;">Debtor(s).</p>	<p>CASE NO.: 2:24-bk-18742-BR CHAPTER: 7</p> <p style="text-align: center;">DECLARATION THAT NO PARTY REQUESTED A HEARING ON MOTION LBR 9013-1(o)(3)</p> <p style="text-align: center;">[No Hearing Required]</p>

1. I am the ☒ Movant(s) or ☐ attorney for Movant(s) or ☐ employed by attorney for Movant(s).
2. On (*date*): 06/05/2025 Movant(s) filed a motion or application (Motion) entitled: TRUSTEE'S NOTICE OF INTENT TO ABANDON CERTAIN REAL PROPERTY AND VEHICLE [DOCKET #27]
3. A copy of the Motion and notice of motion is attached to this declaration.
4. On (*date*): 06/05/2025 Movant(s), served a copy of ☒ the notice of motion or ☐ the Motion and notice of motion on required parties using the method(s) identified on the Proof of Service of the notice of motion.
5. Pursuant to LBR 9013-1(o), the notice of motion provides that the deadline to file and serve a written response and request for a hearing is 14 days after the date of service of the notice of motion, plus 3 additional days if served by mail, or pursuant to F.R.Civ.P. 5(b)(2)(D) or (F).
6. More than 17 days have passed after Movant(s) served the notice of motion.
7. I checked the docket for this bankruptcy case and/or adversary proceeding, and no response and request for hearing was timely filed.
8. No response and request for hearing was timely served on Movant(s) via Notice of Electronic Filing, or at the street address, email address, or facsimile number specified in the notice of motion.

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

9. Based on the foregoing, and pursuant to LBR 9013-1(o), a hearing is not required.

Movant(s) requests that the court grant the motion and enter an order without a hearing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Date: 07/23/2025

/s/ Peter J. Mastan
Signature

Peter J. Mastan, Trustee
Printed name

EXHIBIT 1

Peter J. Mastan, Trustee
peter.mastan@dinsmore.com
550 S. Hope St., Suite 1765
Los Angeles, CA 90071
Telephone: 213-335-7739

Chapter 7 Trustee of the Bankruptcy Estate of
Jessica Jocelyn Mendoza and Christian Michael Alaniz

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re:

JESSICA JOCELYN MENDOZA
CHRISTIAN MICHAEL ALANIZ,

Debtor(s).

Case No. 2:24-bk-18742-BR

Chapter 7

**TRUSTEE'S NOTICE OF INTENT TO
ABANDON CERTAIN REAL PROPERTY
AND VEHICLE**

Date: [No hearing required or requested]

Time:

Ctrm: 1668

255 E. Temple St.

Los Angeles, CA 90012

Judge: Hon. Barry Russell

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1 **TO THE HONORABLE BARRY RUSSELL, UNITED STATES BANKRUPTCY JUDGE,**
2 **THE DEBTORS, THE OFFICE OF THE UNITED STATES TRUSTEE, AND TO ALL**
3 **SCHEDULED CREDITORS OF THE ESTATE:**

4 **NOTICE IS HEREBY GIVEN** that, pursuant to 11 U.S.C. § 554 and Local Bankruptcy
5 Rule 6007-1, Peter J. Mastan, Chapter 7 trustee (the “Trustee”) of the bankruptcy estate (the
6 “Estate”) of Jessica Jocelyn Mendoza and Christian Michael Alaniz (the “Debtors”), intends to
7 abandon the following scheduled property of the Estate (“Abandoned Property”):

8 **REAL PROPERTY**

9 649 E. 76th Pl., Los Angeles, CA 90001-2806 (“Real Property”)

10 **VEHICLE**

11 2011 Dodge Challenger (“Vehicle”)

12 **NOTICE IS FURTHER GIVEN** that the Trustee makes this abandonment of the Real
13 Property on the grounds that it has little to no value to the Estate. The Debtors’ scheduled value
14 of the Real Property is \$713,800, to which the Trustee does not object. Scheduled liens against
15 the Real Property are \$470,000. The Debtors claimed a homestead exemption of \$699,426 under
16 CCP § 704.730. Given that the total of the scheduled liens and the Debtors’ claimed homestead
17 exemption is greater than the Debtors’ valuation of the property, the Trustee does not believe that
18 liquidation of the Real Property would result in a meaningful distribution to creditors.

19 **NOTICE IS FURTHER GIVEN** that the Trustee makes this abandonment of the Dodge
20 on the grounds that it has little to no value to the Estate. The Debtors’ scheduled value of the
21 Dodge is \$2,500, and the Trustee’s independent valuation is \$5,953. There are no scheduled
22 liens, and the Debtors claimed an exemption of \$2,500 against the vehicle under CCP § 704.010.
23 The Trustee believes that the Debtors have sufficient additional exemption available to them
24 under CCP § 704.010 to protect the vehicle at the Trustee’s higher valuation, and he does not
25 believe that liquidation of the Dodge would result in a meaningful distribution to creditors.

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1 **NOTICE IS FURTHER GIVEN** that, pursuant to Local Bankruptcy Rule 6007-1(d)(2),
2 the Trustee intends to request an order from the Court that does all of the following:

3 **1.** Determines that the Abandoned Property is of inconsequential value and
4 benefit to the Estate;

5 **2.** Authorizes the Trustee to immediately abandon the Abandoned Property;
6 and

7 **3.** Determines that adequate notice of the Trustee's intent to abandon the
8 Abandoned Property was given.

9 ***This Notice is being filed and served in accordance with Local Bankruptcy Rule 6007-1.***
10 ***Pursuant to paragraph (c)(1) of that Rule, any objection to the relief sought herein must be***
11 ***filed with the Court and served on the Trustee, the Court, the Debtors, and the Office of the***
12 ***United States Trustee not more than 14 days (plus three for mailing) after service of this Notice***
13 ***at the addresses set forth below:***

14 **For Filing With the Court**

15 Clerk's Office
16 United States Bankruptcy Court
255 E. Temple Street
Los Angeles, California 90012

17 **For Service on Judge Russell**

18 Hon. Barry Russell
19 United States Bankruptcy Court
Central District of California
Edward R. Roybal Federal
20 Building and Courthouse
255 E. Temple Street, Suite 1660
21 Los Angeles, California 90012

22 **For Service on the Office of the United States Trustee**

23 Office of the U.S. Trustee
915 Wilshire Blvd., Suite 1850
Los Angeles, California 90017

24 **For Service on the Trustee**

25 Peter J. Mastan, Trustee
550 South Hope Street, Suite 1765
26 Los Angeles, California 90071-2627

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For Service on the Debtors

Benjamin Heston, Esq.
Nexus Bankruptcy
3090 Bristol Street, #400
Costa Mesa, CA 92626

and

Jessica Jocelyn Mendoza
Christian Michael Alaniz
649 E. 76th Pl.
Los Angeles, CA 90001-2806

**Pursuant to Local Bankruptcy Rule 9013-1(h), failure to timely file and serve an
opposition to this Notice may be deemed to constitute consent to the relief specified in this
Notice.**

Date: June 5, 2025

PETER J. MASTAN, CH. 7 TRUSTEE

By: /s/ Peter J. Mastan
Peter J. Mastan
Chapter 7 Trustee of the Bankruptcy Estate
of Jessica Jocelyn Mendoza and
Christian Michael Alaniz

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 550 S. Hope Street, Suite 1765, Los Angeles, CA 90071

A true and correct copy of the foregoing document described as: **TRUSTEE'S NOTICE OF INTENT TO ABANDON CERTAIN REAL PROPERTY AND VEHICLE** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d), and (b) in the manner indicated below:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF") - Pursuant to controlling General Order(S) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On **June 5, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email addresses indicated below:

- **Benjamin Heston** bhestonecf@gmail.com, benheston@recap.email, NexusBankruptcy@jubileebk.net
- **Christina J Khil** christinao@mclaw.org, CACD_ECF@mclaw.org; mcecfnotices@ecf.courtdrive.com
- **Peter J Mastan (TR)** pmastan@iq7technology.com; travis.terry@dinsmore.com; ecf.alert+Mastan@titledexi.com
- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.go

_____ Service information continued on attached page

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicate method for each person or entity served): On **June 5, 2025** I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTORS

Jessica Jocelyn Mendoza
Christian Michael Alaniz
649 E. 76th Pl.
Los Angeles, CA 90001-2806

 X Service information continued on attached page

III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **June 5, 2025** I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method) by facsimile transmission and/or email as follows: Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

_____ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

June 5, 2025
Date

TRAVIS MICHAEL TERRY
Type name

/s/ Travis Michael Terry
Signature

ADDITIONAL SERVICE INFORMATION (if needed):

SERVED BY FIRST CLASS U.S. MAIL

Bank of America
100 N Tryon St
Charlotte, NC 28202-4036

Capital One
PO Box 30285
Salt Lake City, UT 84130-0285

Chase Card Services
PO Box 15369
Wilmington, DE 19850-5369

Citibank
5800 S Corporate Pl
Sioux Falls, SD 57108-5027

Department of Education
121 S 13th St
Lincoln, NE 68508-1911

JPMorgan Chase Bank, N.A.
s/b/m/t Chase Bank USA, N.A.
c/o National Bankruptcy Services, LLC
PO Box 9013
Addison, Texas 75001-9013

Nationstar Mortgage
PO Box 650783
Dallas, TX 75265-0783

US Department of Education c/o Nelnet
121 South 13th Street
Lincoln, NE 68508-1904

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 550 S. Hope Street, Suite 1765, Los Angeles, CA 90071

A true and correct copy of the foregoing document described as: **DECLARATION THAT NO PARTY REQUESTED A HEARING ON TRUSTEE'S NOTICE OF INTENT TO ABANDON CERTAIN REAL PROPERTY AND VEHICLE** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d), and (b) in the manner indicated below:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF") - Pursuant to controlling General Order(S) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On **July 23, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email addresses indicated below:

- **Benjamin Heston** bhestonecf@gmail.com, benheston@recap.email, NexusBankruptcy@jubileebk.net
- **Christina J Khil** christinao@mclaw.org, CACD_ECF@mclaw.org; mcecfnotices@ecf.courtdrive.com
- **Peter J Mastan (TR)** pmastan@iq7technology.com; travis.terry@dinsmore.com; ecf.alert+Mastan@titlexi.com
- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.go

____ Service information continued on attached page

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On **July 23, 2025** I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTORS

Jessica Jocelyn Mendoza
Christian Michael Alaniz
649 E. 76th Pl.
Los Angeles, CA 90001-2806

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____ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

July 23, 2025
Date

TRAVIS MICHAEL TERRY
Type name

/s/ Travis Michael Terry
Signature